

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

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MYNETTE TECHNOLOGIES, INC.  
and STEVEN M. COLBY,

Plaintiffs,

v.

THE UNITED STATES,

Defendant,

and

GEMALTO, INC. and IDEMIA IDENTITY  
& SECURITY USA LLC,

Intervenor-Defendants.

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Case No. 16-cv-01647-RTH

Judge Ryan T. Holte

**JOINT MOTION FOR ENLARGEMENT OF TIME TO FILE JOINT SUBMISSIONS**

WHEREAS, on December 5, 2022, the Court issued an Opinion and Order granting-in-part Defendants' Motion for Sanctions. (ECF No. 153)

WHEREAS, in the Opinion and Order, the Court ordered the parties to, *inter alia*, jointly (i) file a motion to vacate the Court's protective order (ECF No. 74) by December 19, 2022, (ii) file a stipulated amended protective order including a covenant not to sue consistent with the Opinion and Order by December 19, 2022, and (iii) file a joint status report proposing a timeline for further proceedings consistent with the Court's Opinion and Order by January 4, 2023.

WHEREAS, the Court has granted several joints requests for extensions of those dates, and the current deadlines are: the deadline for the Joint Motion to Vacate the Protective Order and

Stipulated Amended Protective Ordering containing a covenant not to sue is February 3, 2023; and the deadline for a joint status report proposing a timeline for further proceedings is February 8, 2023. *See* 1/20/23 Court Order.

WHEREAS, the parties jointly make this request because the parties are continuing to negotiate the proposed covenant and believe that more time would potentially allow the parties to reach agreement or otherwise narrow the issues.

THEREFORE, Plaintiffs, Defendant, and Third Party Defendants respectfully request that the Court grant their joint request for an enlargement of time. With this enlargement, the deadline for the Joint Motion to Vacate the Protective Order and Stipulated Amended Protective Order containing a covenant not to sue will be February 17, 2023, and the deadline for a joint status report proposing a timeline for further proceedings will be February 24, 2023.

Respectfully submitted,

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February 3, 2023

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February 3, 2023